

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Case No. 1:22-cv-00125

Plaintiffs,

v.

Hon. Matthew F. Kennelly

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

CORRECTED SUPPLEMENT TO
PLAINTIFFS' PENDING MOTION TO COMPEL

Plaintiffs hereby supplement their pending Motion to Compel, Dkt. 331, with the updated information that since Plaintiffs filed the Motion, they have met and conferred with all of the Defendants and, considering the various agreements that the Plaintiffs have reached with Defendants in those discussions, the numerous documents that certain Defendants have produced

since Plaintiffs filed the Motion, the documents that certain Defendants have promised to produce by April 30, 2023, and certain other representations, Plaintiffs have agreed to withdraw the Motion in its entirety (without prejudice to renewing it in consideration of whether the terms of withdrawal have been satisfied and certain other reservations of rights negotiated with individual Defendants) as to these thirteen (13) Defendants: Brown, CalTech, Cornell, Dartmouth, Duke, Emory, MIT, Northwestern, Notre Dame, Penn, Rice, Vanderbilt, and Yale.

Dated: April 6, 2023
New York, NY

By: s/ Edward J. Normand
Devin "Vel" Freedman
Edward J. Normand
Richard Cipolla
Peter Bach-y-Rita
FREEDMAN NORMAND
FRIEDLAND LLP
99 Park Avenue
Suite 1910
New York, NY 10016
Tel: 646-970-7513
vel@fnf.law
tnormand@fnf.law
rcipolla@fnf.law
pbachyrita@fnf.law

Eric L. Cramer
Caitlin G. Coslett
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
ccoslett@bm.net
ecramer@bm.net

Daniel J. Walker
Robert E. Litan
Hope Brinn
BERGER MONTAGUE PC
2001 Pennsylvania Avenue, NW

Tel: 215-875-3000
s/ Robert D. Gilbert
Robert D. Gilbert
Elpidio Villarreal
Robert S. Raymar*
Sarah Schuster
Alexis Marquez
Steven Magnusson
GILBERT LITIGATORS &
COUNSELORS, P.C.
11 Broadway, Suite 615
New York, NY 10004
Phone: (646) 448-5269
rgilbert@gilbertlitigators.com
pdvillarreal@gilbertlitigators.com
rraymar@gilbertlitigators.com
sschuster@gilbertlitigators.com
amarquez@gilbertlitigators.com
smagnusson@gilbertlitigators.com

* *Pro hac vice*

Suite 300
Washington, DC 20006
Tel: 202-559-9745
rlitan@bm.net
dwalker@bm.net
hbrinn@bm.net

Counsel for Plaintiffs